

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAROL STASZEWSKI,

Plaintiff,

v.

WELLESLEY COLLEGE,

Defendant.

Civil Action No. 05-10930 NMG

**JOINT MOTION TO EXTEND PRETRIAL SCHEDULING
ORDER DEADLINES BY SIXTY DAYS**

The parties in this action, through counsel, hereby respectfully request that the Court extend the scheduling order deadlines in this case by sixty days.

Specifically, it is requested that the scheduling order be extended as follows:

1. Fact depositions to be completed and Rule 36 Requests for Admissions to be served by March 30, 2007.
2. Plaintiff to designate expert witnesses by March 30, 2007.
3. Defendant to designate expert witnesses by April 30, 2007.
4. Expert depositions to be completed by May 30, 2007.
5. Dispositive motions to be served by July 16, 2007.
6. Oppositions to dispositive motions to be served within thirty days of service of dispositive motions.

As grounds for this motion, the parties state that they have entered into negotiations and believe resolution may be achieved through negotiations. In the event no resolution is achieved, the parties need additional time to finish discovery.

CAROL STASZEWSKI,
By her attorney,

WELLESLEY COLLEGE,

By its attorneys,

HOLLAND & KNIGHT LLP

/s/ Mitchell J. Notis
Mitchell J. Notis (BBO # 374360)
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445

/s/ Miriam J. McKendall, P.C.
Miriam J. McKendall, P.C. (BBO # 548825)
Holland & Knight LLP
10 St. James Avenue
Boston, Massachusetts 02116
(617) 523-2700

Dated: January 25, 2007

CERTIFICATE OF SERVICE

I, Miriam J. McKendall, P.C., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 25th day of January, 2007.

/s/ Miriam J. McKendall, P.C.
Holland & Knight LLP
10 St. James Avenue
Boston, Massachusetts 02116
(617) 523-2700

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